

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION**

LULAC, et. al.,	§	
	§	
<i>Plaintiffs</i>	§	
	§	
Eddie Bernice Johnson, Sheila Jackson-Lee	§	
Alexander Green, and Jasmine	§	
Crockett	§	
	§	
Plaintiff-Intervenors	§	
	§	Case No.: 3-21-CV-00259-DCG-
	§	JES-JVB [Lead Case]
v.	§	
	§	
GREG ABBOTT, in his official capacity	§	
As Governor of Texas, et. al.	§	
	§	
<i>Defendants</i>	§	

**PLAINTIFF-INTERVENORS, ALEXANDER GREEN AND JASMINE CROCKETT'S  
PRETRIAL DISCLOSURES PURSUANT TO FEDERAL RULE OF CIVIL  
PROCEDURE 26(a)(3)**

Pursuant to Federal Rule of Civil Procedure 26(a)(3), Plaintiff-Intervenors Alexander Green and Jasmine Crockett ("Plaintiff-Intervenors") provide the following pretrial disclosures:

**I. WITNESSES (Fed. R. Civ. P. 26(a)(3)(A)(i))**

Plaintiff-Intervenors identify the following individuals whose testimony they expect to present at trial, other than solely for impeachment:

**(A) Witnesses Plaintiff-Intervenors Expect to Call:**

1. Congressman Alexander Green (Contact through counsel)
2. Congresswoman Jasmine Crockett (Contact through counsel)
3. State Representative Ron Reynolds (P.O. Box 2910, Austin, TX 78768 or (512) 463-0494, unless represented by counsel) - Subject: Actions on Congressional Map, proceeding irregularities, meetings, map change efforts, discrimination issues, history, floor debate irregularities, amendments, scheduling, voter movements, communities of interest, discriminatory purpose, data, procedures, vote dilution, packing, cracking, discrimination, vestiges, Harris/Fort Bend redistricting, Communities of Interest in Houston/Fort Bend, changes regarding redistricting over time.

4. State Representative Nicole Collier (P.O. Box 2910, Austin, TX 78768 or (512) 463-0716, unless represented by counsel) - Subject: Actions on Congressional Map, map change efforts, discrimination issues, history, floor debate issues, amendments, scheduling, voter movements, communities of interest, discriminatory purpose, data, procedures, vote dilution, packing, cracking, discrimination, vestiges, DFW Redistricting, Communities of Interest in Tarrant County.
5. State Representative Yvonne Davis (P.O. Box 2910, Austin, TX 78768 or (512) 463-0598, unless represented by counsel) - Subject: Actions on Congressional Map, proceeding irregularities, meetings, map change efforts, discrimination issues, history, floor debate irregularities, amendments, scheduling, voter movements, communities of interest, discriminatory purpose, data, procedures, vote dilution, packing, cracking, discrimination, vestiges, DFW Discrimination, Communities of Interest in Dallas County, efforts to address redistricting discrimination, floor debate, changes impacting redistricting over time.
6. Senator Royce West ((512) 463-0123, unless represented by counsel) - Subject: Actions on Congressional Map, map change efforts, discrimination issues, history, floor debate issues, amendments, scheduling, voter movements, communities of interest, discriminatory purpose, data, procedures, vote dilution, packing, cracking, discrimination, vestiges, Communities of Interest in Dallas and Tarrant Counties, Committee procedures and actions, floor debate and discussion, changes respecting redistricting over time.
7. Bishop James Dixon II, President of Houston NAACP (2002 Wheeler Avenue, Houston, TX 77004) - Subject: Changes, proposed changes, historical construction of CD 18, communities of interest in Houston/Fort Bend.
8. Dr. Richard Murray – Expert testimony, this testimony will be required to be virtual because of age and health issues, so Intervenor will be contacting the State and other parties to see if they agree. Has mobility issues due to three surgeries.
9. Dr. Howard Henderson – Expert testimony

**(B) Witnesses Plaintiff-Intervenors May Call if the Need Arises:**

1. Senator Borris Miles ((512) 463-0113, unless represented by counsel) - Subject: Actions on Congressional Map, proceeding irregularities, meetings, map change efforts, discrimination issues, history, floor debate irregularities, amendments, scheduling, voter movements, communities of interest, discriminatory purpose, data, procedures, vote dilution, packing, cracking, discrimination, vestiges, Houston/Fort Bend Discrimination and attempts to address fixes for CDs 9 and 18, Communities of Interest in Harris/Fort Bend.
2. Commissioner Rodney Ellis (Contact through Harris County office)
3. Senator Roland Gutierrez (Contact at Texas State Capitol office)
4. Representative Gina Hinojosa
5. Yannis Banks (Contact through counsel for Texas NAACP)
6. Dr. Brian Rowland (Contact through counsel for Texas NAACP)
7. Dr. Angela Valenzuela (Contact through Black and Brown Dialogues on Policy)
8. Dr. Emilio Zamara (Contact through Black and Brown Dialogues on Policy)
9. Representative Jessica Gonzales
10. George Korbel-Expert testimony

11. Representative Senfronia Thompson
12. Any person designated by the Disclosures of any party should the need arise.

## **II. DEPOSITION TESTIMONY (Fed. R. Civ. P. 26(a)(3)(A)(ii))**

Plaintiff-Intervenors designate the following witnesses whose testimony is expected to be presented by deposition:

1. Congresswoman Sheila Jackson-Lee, deceased.

## **III. EXHIBITS (Fed. R. Civ. P. 26(a)(3)(A)(iii))**

Plaintiff-Intervenors expect to offer the following documents and exhibits at trial, other than solely for impeachment:

### **(A) Documents Plaintiff-Intervenors Expect to Offer:<sup>1</sup>**

1. Redistricting Committee Rules in House
2. Redistricting Committee Rules in Senate
3. House Rules
4. Senate Rules
5. Public Hearing Schedules in House for Redistricting
6. Public Hearing Schedules in Senate for Redistricting
7. Select Conference Committee Appointments in Senate and House
8. Redistricting Guidance provided to members of the Legislature
9. Floor Debate Rules for House on Redistricting
10. Floor Debate Rules for Senate on Redistricting
11. Request by Senator West to delay Senate Redistricting Process
12. Communications between Legislators regarding inability to have C2131 considered by Legislature
13. Select copies of House Journal
14. Select copies of Senate Journal
15. Demonstrative Exhibits to Show Racial Considerations in Drawing of Plan
16. Demonstrative Maps and According Data to Show DFW Alternatives
17. Notice of Hearings for Redistricting Committee
18. News article regarding Senate Redistricting procedures
19. Judicial Admissions

### **(B) Documents Plaintiff-Intervenors May Offer if the Need Arises:**

1. Letter from Congresswoman Sheila Jackson Lee and Congressman Alexander Green to State Legislative Leadership

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<sup>1</sup> Intervenors compiled this list in anticipation that the parties would have a Joint Exhibit List filed of even date. As the parties intend to request leave of the Court to continue negotiating the Joint Exhibit List, Intervenor's may have need to amend this list in due course.

2. Letter from Congresswoman Eddie Bernice Johnson to House Redistricting Chair Todd Hunter and State Leadership
3. Maps presented by Representative Crockett and report package and citizenship data (e.g., C2139)
4. Maps prepared for Congresspersons Green and Jackson Lee and report package and citizenship data (e.g., C2131)
5. Report package and supporting data for maps drawn by/presented by Rep. Crockett
6. Report package and supporting data for maps drawn by/for/presented by Sen. Miles
7. Social Media Communications from State Officials re: Redistricting/Election Reform
8. Documents re: organizational relationship with affiliates/member groups
9. Email/communications scheduling Redistricting Committee Hearings
10. Rules of Redistricting Committees (House/Senate) for 2021 and prior sessions
11. Video/Transcripts of Committee/Floor Proceedings
12. Amended Expert Report by Richard Murray (Exhibit D)
13. Supplemental Report by Jack Sevil and Howard Henderson (Exhibit E)
14. Second Supplemental Report by Howard Henderson
15. TLC Compactness Analysis (Exhibit F)
16. Statement of George Korbel (Exhibit G)
17. Plaintiff-Intervenors' Responses to State of Texas's First Set of Requests for Production
18. Plaintiff-Intervenors' Initial Disclosures
19. Plaintiff-Intervenors' Supplemental Disclosures
20. Files relating to specific bills considered 2021-2025
21. Comments from Redistricting Committee chair involving racial consideration
22. Files relating to bill consideration where rules were suspended (2021, 2023, prior years)
23. The "Map Report Package" for Plan C2131, as generated by TLC
24. The "Map Report Package" for Plan C2139, as generated by TLC
25. Census Data
26. Benchmark Plan (C2100) and "Map Report Package" for Plan C2100, as generated by TLC.
27. Enacted Plan (C2193) and "Map Report Package" for Plan C2100, as generated by TLC
28. Information/communication provided to Legislators by the State for Redistricting.
29. *Texas v. United States*, 887 F. Supp. 2d 133 (D.D.C. 2012)
30. Historical analysis of Redistricting Committee
31. GUIDE TO 2021 REDISTRICTING, Texas Legislative Council
32. Drafting Manual January 2021, 2025, Texas Legislative Council,
33. Texas Legislative Manual, Texas Legislative Council
34. Any other relevant documents designated by any other party.

#### **IV. DATE OF DISCLOSURE**

These disclosures are made as of May 2, 2025. Plaintiff-Intervenors reserve the right to supplement these disclosures as required by the Federal Rules of Civil Procedure and any Orders of this Court.

Respectfully Submitted,

/s/ **Gary L. Bledsoe**

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